

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB (LJC)

**MASTER REPORT OF  
PRIVILEGE DETERMINATIONS  
AND ORDER**

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This Order Relates To:

*ALL ACTIONS*

The standards governing privilege review for this multi-district litigation have been set forth in multiple orders of Magistrate Judge Cisneros. *See* Dkts. 1908, 2005, 2168.

Pursuant to Master Order No. 2, Uber has produced 155 documents for which the privilege designations have been challenged by plaintiffs for *in camera* review. These documents are associated with custodians Michael Sullivan, Gus Fuldner, and Dennis Cinelli.

The parties briefed their respective positions on these challenges, and Uber provided three declarations in support of its privilege claims. Dkts. 2460–2463. Plaintiffs withdrew challenges to five documents after the parties’ meet and confer process. Additionally, Uber intends to produce approximately 20 of the 155 documents with new redactions.<sup>1</sup> The Master has reviewed the remaining documents *in camera*.

The Master has determined that 110 of the documents are privileged in whole or in part and 20 are not privileged. The Master has also ordered Uber to provide additional information regarding two of the documents within five days of this Order. Those determinations have been

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<sup>1</sup> Plaintiffs may challenge these documents upon review of the newly produced redacted versions.

provided to the parties. Any objections shall be submitted in accordance with Master Order No. 2.<sup>2</sup>

Any documents ordered by the Master to be produced with new redactions may be challenged by plaintiffs within five days of receiving the documents. The parties shall meet and confer within three days after plaintiffs provide their challenges to Uber. Any outstanding challenges may be submitted to the Master for review within two days of the meet and confer process and Uber shall produce the associated documents within the same time period.

Dated: New York, New  
York March 18, 2025

  
HON. BARBARA S. JONES (Ret.)

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<sup>2</sup> The parties have informed the Master that they are in the process of meeting and conferring in an effort to agree on a request for a modification of the time period to submit objections.